

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 06-0526
Consideration of the federal standard on)	
time-based metering and communications in)	
Section 1252 of the Energy Policy Act of 2005)	

**SUPPLEMENTAL REPLY COMMENTS
ON BEHALF OF
THE AMEREN COMPANIES**

At the status hearing of October 25, 2006, the Staff of the Illinois Commerce Commission ("Staff") requested that the Ameren Companies and other utilities respond specifically to the question as to whether the Illinois Commerce Commission ("Commission") should conduct an investigation, as to whether it is appropriate for utilities to provide and install time-based meters and communication devices for each of their customers. The Ameren Companies and other parties had addressed the need for an investigation as it related to time-based pricing rate schedules and other demand response programs; Staff's interest is whether time-based meters should be installed for each customer.

The Ameren Companies generally concur with the reasoning and conclusions reached by the Staff in its Initial Comments with regard to this particular question. At page 13 of its filing, Staff notes that providing smart meters to all customers would be a very costly proposition, that ratepayers would be required to pay for such meters, and that many customers have no interest in time-based pricing and, therefore, have no use for smart meters, at least in the current term. There are approximately 1.2 million electric customers being served by the Ameren Companies in the State of Illinois. Applying the cost estimate

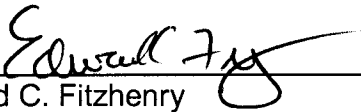
identified by Staff of approximately \$150 - \$200 per customer, for installation, the resulting cost impact could exceed \$200 million. Moreover, it is not apparent to the Ameren Companies at this point in time that all of our customers want or demand smart meters. As it stands now, there is limited interest in real-time pricing but there has been no demand for smart meters. Therefore, it would not be prudent to engage in this large expenditure for a product or service that is not being universally demanded.

Furthermore, as stated in our Initial Comments, the Ameren Companies have in place real-time pricing tariffs, and have proposed Rider ESP in the context of their pending delivery service rate cases as well as Rider PRP recently filed and intending to be compliant with the recent revision to Section 16-107. With these real-time pricing services or service, residential customers who actually want this service will have interval meters and, therefore, can take advantage of time-based pricing.

We also add that installing smart meters for every customer in Illinois would not only be costly, but would be time consuming and complicated. It would take years to accomplish this task as substantial planning would first have to be undertaken, then contractors and other personnel retained by which to make these installations, undergo the actual installation of such meters, and so forth. In addition, and as also noted in the Staff's Initial Comments, the Ameren Companies are currently installing automated meter reading modules in over 600,000 meters, which would only add to the complexity.

Dated: November 3, 2006

Respectfully submitted,

By:  _____

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CERTIFICATE OF SERVICE

I, hereby certify that a copy of the foregoing was served electronically to all parties of record and e-Docket on this 3 day of November, 2006.



Edward C. Fitzhenry